

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**LITTLE GIANT LADDER
SYSTEMS, LLC**, a Utah company,

Plaintiff,

vs.

TRICAM INDUSTRIES, INC., a
Minnesota corporation,

Defendant.

Case No. 0:20-cv-02497-KMM-ECW

**JOINT MOTION TO AMEND
EXPERT DEADLINES IN
SCHEDULING ORDER**

Plaintiff Little Giant Ladder Systems, LLC (“Plaintiff”) and Defendant Tricam Industries, Inc. (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly move the Court to amend certain expert-related deadlines currently set by the Second Amended Scheduling Order (Dkt. 115).

On September 23, 2022, the Court entered its Order (Dkt. 120) on Plaintiff’s Motion to Compel which triggered certain deadlines set forth in Second Amended Scheduling Order (Dkt. 115). The Parties conferred on September 29, 2022 and Defendant’s counsel informed Plaintiff’s counsel of significant scheduling conflicts of its damages expert based on when the response report deadline fell. The Parties agreed to extend the expert report deadlines by approximately 14 days to accommodate Defendant’s conflicts while ensuring the subsequent summary judgment and trial ready deadlines remained unchanged.

Accordingly, the Parties believe good cause exists to amend the scheduling order and jointly move the Court to modify the Second Amended Scheduling Order (Dkt. 115) as follows:

| <u>Event</u> | <u>Current Deadline</u> | <u>Proposed Deadline</u> |
|---|---|---------------------------------|
| Party with burden of proof must disclose initial expert report | October 7, 2022 | October 21, 2022 |
| Opposing Party (without burden of proof) must disclose response expert report | November 7, 2022 | November 21, 2022 |
| Party with burden of proof must disclose rebuttal expert report | November 22, 2022 | December 9, 2022 |
| Expert discovery cutoff | January 6, 2023 | January 23, 2023 |
| Non-dispositive motions regarding expert discovery | January 23, 2023 | February 3, 2023 |
| Deadline to file summary judgment motion | February 3, 2023 | <i>No change</i> |
| Deadline to file summary judgment opposition brief | March 3, 2023 | <i>No change</i> |
| Deadline to file summary judgment reply brief | March 17, 2023 | <i>No change</i> |
| Summary judgment hearing | TBD | <i>No change</i> |
| Trial ready | 60 days after the Court issues its Summary Judgment Order | <i>No change</i> |

A proposed order is attached for the Court's convenience.

Dated: September 30, 2022

By: /s/ Mark A. Miller

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